

# **EXHIBIT 10**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION                      MDL No. 2804  
OPIATE LITIGATION                                      Case No. 17-md-2804

This document relates to:                      Judge Dan  
   Aaron Polster

The County of Cuyahoga v. Purdue  
Pharma, L.P., et al.  
Case No. 17-OP-45005

City of Cleveland, Ohio vs. Purdue  
Pharma, L.P., et al.  
Case No. 18-OP-45132

The County of Summit, Ohio,  
et al. v. Purdue Pharma, L.P.,  
et al.  
Case No. 18-OP-45090

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VOLUME I  
Videotaped Deposition of Kyle J. Wright  
Washington, D.C.  
February 28, 2019  
9:33 a.m.

Reported by: Bonnie L. Russo  
Job No. 3244302

1 Deposition of Kyle J. Wright held at:

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3  
4  
5  
6 Williams & Connolly, LLP  
7 725 12th Street, N.W.  
8 Washington, D.C.  
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14  
15  
16 Pursuant to Notice, when were present on behalf  
17 of the respective parties:  
18  
19  
20  
21  
22  
23  
24  
25

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7 ALSO PRESENT:

8 David Cohen, Special Master

Renee A. Bacchus, Esq., United States

9 Department of Justice, United States Attorney's  
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10 Robert E. Chandler, Esq., United States

Department of Justice, Civil Division

11 David M. Finkelstein, Esq., United States

Department of Justice, Civil Fraud Section

12 Mariama C. Spears, Esq., United States

Department of Justice, Drug Enforcement

13 Administration

Daniel Russo, Videographer

P R O C E E D I N G S

THE VIDEOGRAPHER: Good morning.

We are going on the record at 9:33 a.m. on February 28, 2019.

Please note that the microphones are sensitive and may pick up whispering, private conversations and cellular interference. Please turn off all cell phones or place them away from the microphones as they can interfere with the deposition audio. Audio and video recording will continue to take place unless all parties agree to go off the record.

This is Media Unit 1 of the video recorded deposition of Kyle Wright, taken by counsel for the defendant in the matter of In Re National Prescription Opioid Litigation, filed in the United States District Court for the Northeastern District of Ohio, Eastern Division, Case No. MDL, No. 2804, 17-MD-2804.

This deposition is being held at Williams & Connolly, located at 725 12th Street, Northwest, Washington, D.C.

My name is Daniel Russo from the firm Veritext Legal Solutions, and I'm your

1 videographer today. The court reporter is  
2 Bonnie Russo from the firm Veritext Legal  
3 Solutions.

4 Counsel and all present in the room  
5 and everyone attending remotely will now state  
6 their appearances and affiliations for the  
7 record, please.

8 MS. MAINIGI: Enu Mainigi for  
9 defendant Cardinal.

10 MS. McNAMARA: Colleen McNamara for  
11 Cardinal Health.

12 MS. WICHT: Jennifer Wicht for  
13 Cardinal Health.

14 MS. McCCLURE: Shannon McClure, Reed  
15 Smith, for AmerisourceBergen Drug Corporation.

16 MR. EPPICH: Chris Eppich of  
17 Covington & Burling for McKesson.

18 MR. MATTHEWS: James Matthews for  
19 Anda, Inc.

20 MS. LEVY: Jennifer Levy for the  
21 Allergan defendants.

22 MR. O'CONNOR: Andrew O'Connor for  
23 Mallinckrodt, LLC, and SpecGX.

24 MR. DAVISON: William Davison for  
25 Mallinckrodt, LLC, and SpecGX, LLC.

1 MR. STEPHENS: Neal Stephens from  
2 Jones Day for Walmart.

3 MR. PADGETT: Bill Padgett, Barnes &  
4 Thornburg, for Defendant H.D. Smith.

5 MR. BARKER: Jeff Barker for Janssen  
6 Pharmaceuticals and Johnson & Johnson.

7 MR. DAVIS: Josh Davis for the Endo  
8 defendants.

9 MS. VANNI: Amy Vanni for the Endo  
10 defendants.

11 MS. VENTURA: Catie Ventura for the  
12 Allergan defendants.

13 MR. RUIZ: Anthony Ruiz for CVS  
14 Indiana, LLC, and CVS Rx Services, Inc.

15 MR. BARNES: Robert Barnes, HBC  
16 Service Company.

17 MR. HARRIS: Alex Harris, Walgreens  
18 Company and Walgreens Eastern Company, Inc.

19 MR. MASTERS: Brad Masters, Cardinal  
20 Health.

21 MS. O'GORMAN: Debra O'Gorman for  
22 the Purdue defendants.

23 MS. KVESELIS: Emily Kveselis for  
24 McKesson.

25 MR. STANNER: Andrew Stanner,

1 McKesson.

2 MR. HOBART: Geoff Hobart, McKesson.

3 MS. MAINIGI: Defendants on the  
4 phone?

5 MR. BEISELL: Patrick Beisell for  
6 Walmart.

7 MS. MAINIGI: Any other defendants  
8 on the phone?

9 MR. LIVINGSTON: Scott Livingston  
10 for Defendant HBC.

11 MS. BRUNNER: Madeleine Brunner,  
12 Locke Lord, for Henry Schein.

13 MR. KRNCCEVIC: Ray Krncevic for  
14 Janssen.

15 MR. MARTIN: Zach Martin for  
16 Prescription Supply.

17 MR. LEEDER: Bill Leeder for H.D.  
18 Smith.

19 MS. MAINIGI: Plaintiffs?

20 MR. MIGLIORI: Don Migliori for the  
21 Summit County plaintiffs.

22 MR. SHKOLNIK: Hunter Shkolnik for  
23 Cuyahoga County plaintiffs.

24 MS. MAINIGI: Plaintiffs on the  
25 phone?

1 MR. FARRELL: Paul Farrell, Jr., on  
2 behalf of plaintiffs.

3 THE VIDEOGRAPHER: Will the court --  
4 oh.

5 MS. MAINIGI: Let's let the  
6 government attorneys introduce themselves.

7 MR. BENNETT: For the United States  
8 and the Department of Justice, James Bennett  
9 from the U.S. Attorney's Office in Cleveland.

10 MR. CHANDLER: Robert Chandler,  
11 United States -- or -- United States Department  
12 of Justice.

13 MR. FINKLESTEIN: David Finklestein  
14 from the United States Department of Justice.

15 MS. BACCHUS: Renee Bacchus with the  
16 Department of Justice from the Northern  
17 District of Ohio U.S. Attorney's Office.

18 MS. SPEARS: Mariama Spears, Drug  
19 Enforcement Administration.

20 MR. TAYMAN: David Tayman for Kyle  
21 Wright in his individual capacity.

22 MS. MAINIGI: Special Master Cohen,  
23 do you -- you're on the phone as well, correct?

24 SPECIAL MASTER COHEN: I am. Good  
25 morning everybody.

1 THE VIDEOGRAPHER: Will the court  
2 reporter please swear in the witness.

3 MS. MAINIGI: Actually, before --  
4 before we swear in the witness, David Cohen,  
5 before we came back into the room and went on  
6 the record, we had an opportunity, primarily  
7 plaintiff's counsel and defense counsel, to  
8 speak to you about a few outstanding issues.

9 May we ask --

10 SPECIAL MASTER COHEN: Right. So  
11 I'd like to -- I'd like to go ahead and put a  
12 couple of things on the record before you swear  
13 the witness, which are essentially ground rules  
14 on how this will be forward.

15 So the -- the court reporter should  
16 go ahead and go on the record.

17 First of all, good morning, Mr.  
18 Wright.

19 You're the star of the show this  
20 morning. And so we all appreciate you making  
21 yourself available.

22 Just so that I understand how this  
23 is going to go forward, because I'm not in the  
24 room, I assume that there is going to be one  
25 counsel for each group of defendants who is



1       doing questioning.

2               Enu, I assume that that's you on  
3       behalf of distributors.

4               Am I right so far?

5               MS. MAINIGI:   Correct.   Correct.

6               SPECIAL MASTER COHEN:   Hello?

7               MS. MAINIGI:   Yes.

8               Can you hear me?

9               SPECIAL MASTER COHEN:   Okay.

10              MS. MAINIGI:   Yes.

11              SPECIAL MASTER COHEN:   Yeah.

12              Actually, depending on how far  
13       people are sitting from one of those  
14       microphones, it's either very easy or very  
15       difficult to hear counsel.

16              And then just for my own  
17       understanding, and I guess for Mr. Wright's  
18       understanding of how things will go forward,  
19       who besides you, Enu, will be questioning Mr.  
20       Wright for the defendant?

21              MS. MAINIGI:   Who --

22              SPECIAL MASTER COHEN:   I'm sorry.   I  
23       didn't hear.

24              MS. MAINIGI:   Oh, who besides.   Yes.

25              So Andrew O'Connor will question for

1 the -- for pharma. And Neal Stephens will  
2 question for the pharmacies.

3 SPECIAL MASTER COHEN: Okay.

4 And then on behalf of plaintiffs, it  
5 will be Mr. Migliori?

6 MR. MIGLIORI: Yes. It'll be. But  
7 it also will be -- and -- and this is hopefully  
8 acceptable going forward for all witnesses.  
9 Given the two counties, we'd like to be able to  
10 have the option to have both -- a lawyer from  
11 each county question.

12 So Hunter Shkolnik is also here.  
13 And we were going to split the time, not to --

14 SPECIAL MASTER COHEN: That's fine.

15 MR. MIGLIORI: Okay.

16 SPECIAL MASTER COHEN: Okay. And  
17 then I heard a number of government counsel. I  
18 -- I caught James Bennett's name and I think a  
19 Mr. Chandler and also an attorney who said he  
20 was there individually on behalf of Mr. Wright.

21 And so I just want to understand who  
22 will be the -- maybe, for example, interposing  
23 objections on behalf of Mr. Wright?

24 MR. BENNETT: So, Special Master  
25 Cohen, this is James Bennett. I will be

1 interjecting objections on behalf of the United  
2 States.

3 I anticipate that Mr. Wright's  
4 private attorney, whose name is David Tayman,  
5 may also have objections on behalf of Mr.  
6 Wright in his individual capacity.

7 So I expect that two of us will be  
8 the ones who will be making objections on  
9 behalf of the government and Mr. Wright.

10 MR. TAYMAN: Mr. Cohen, this is  
11 David Tayman. To -- to the extent that there  
12 are objections to impose on Mr. Wright's behalf  
13 as an individual, I will be making those.

14 SPECIAL MASTER COHEN: Okay. So a  
15 few ground rules.

16 First of all, I understand that  
17 counsel for the government or Mr. Wright may  
18 interpose objection. Those objections should  
19 be as brief as possible. Often you merely need  
20 to say the word "objection" and sometimes three  
21 or four words in explanation as to what the  
22 basis for that objection is. But there should  
23 not be speaking objections as a general matter.

24 Mr. Wright, when one of your  
25 attorneys seeks to interpose an objection, you

1       should let him. You should allow time for  
2       counsel to object. But once that objection is  
3       made, you normally, almost always, will go  
4       ahead and answer the question that you were  
5       asked unless you're directed not to respond by  
6       your attorney. And that's a fairly unusual  
7       circumstance, usually because the question asks  
8       for you to reveal communications you had with  
9       counsel. That's the main reason that you  
10      wouldn't answer a question. But normally you  
11      will answer the question even though an  
12      objection is interposed.

13               So a couple of things that we talked  
14      about before we -- before we went on the record  
15      was kind of the splitting the time and also the  
16      extent to which leading questions could be  
17      asked.

18               Regarding the splitting of time, the  
19      way this is going to go forward is that  
20      defendants will be questioning first, and then  
21      plaintiffs. And then defendant are going to  
22      reserve some time to ask kind of a second round  
23      of questions. And plaintiffs are going to  
24      reserve time to ask a second round of  
25      questions. Let's call that defendants' one and

1       plaintiffs' one and then defendants' two,  
2       plaintiffs' two.

3               As a general matter, the parties  
4       should -- are allowed to reserve time for  
5       defendants' two and plaintiffs' two. And as a  
6       general matter, that should be in the range of  
7       20 to 30 percent, at most, of the time that's  
8       been allotted.

9               So defendants have eight hours.  
10       They can reserve, you know, up to two and a  
11       half hours. But really it should be as little  
12       as possible, closer to one and a half hours.

13              And in the same way, the plaintiffs  
14       have three and a half hours. If they were to  
15       reserve 20 to 30 percent of that, then that's,  
16       off the top of my head, an hour and 15  
17       minutes-ish.

18              And -- and that reserved amount of  
19       time will only be used to the extent necessary.  
20       So, for example, if defendants' two questioning  
21       takes place, it would be limited to the  
22       cross-examination essentially of -- of -- of  
23       plaintiffs' one questioning. It's not going to  
24       go beyond the scope. And similarly,  
25       plaintiffs' two wouldn't go beyond the scope of

1 defendants' two -- call it recross.

2 So that's way it's going go forward.  
3 Everybody can reserve time but should use as  
4 little of it as possible and as little of it as  
5 necessary.

6 The other rule that I'm laying down  
7 here is that, given that this is a third-party  
8 witness, given the nature of the -- the  
9 parties' positions and extent to they've had  
10 conversations already with the deponent, both  
11 sides may ask leading questions but should do  
12 so as little as possible.

13 If -- if adversity is established,  
14 that opens it up a bit more. But I just think  
15 it's going to lead to a quicker deposition,  
16 less time for Mr. Wright in total, and an  
17 easier process if I say now that leading  
18 questions as a general matter may be asked but  
19 should only be asked if necessary.

20 So the better approach is to ask a  
21 question without leading. But if it becomes  
22 necessary, both sides are allowed to do that.

23 I think that's all I have.

24 Are there any questions of counsel  
25 for me before we begin?

1 Okay.

2 MS. MAINIGI: I see none.

3 SPECIAL MASTER COHEN: I'll be  
4 putting myself on mute. So if you do need me,  
5 it may take me a second to come back online.  
6 But I will be listening in. And I'll let you  
7 go to it.

8 THE VIDEOGRAPHER: Will the court  
9 reporter please swear in the witness.

10

11 KYLE J. WRIGHT,  
12 being first duly sworn, to tell the truth, the  
13 whole truth and nothing but the truth,  
14 testified as follows:

15 EXAMINATION BY COUNSEL FOR DEFENDANT

16 CARDINAL HEALTH, INC.

17 BY MS. MAINIGI:

18 Q. Good morning, Mr. Wright.

19 If you could put your full name on  
20 the record, please.

21 A. Kyle James Wright.

22 Q. Are you currently employed?

23 A. No.

24 Q. Are you retired?

25 A. Yes.

1 MR. MIGLIORI: Objection to form.

2 THE WITNESS: I do not object to  
3 this.

4 BY MS. MAINIGI:

5 Q. So based on your recollection and  
6 your review sitting here today, you agree --  
7 you have no reason to disagree with the  
8 testimony you provided in 2011?

9 A. Yes, ma'am.

10 MR. SHKOLNIK: Objection. Improper  
11 use of the document.

12 BY MS. MAINIGI:

13 Q. Let me ask you -- let me the switch  
14 for one moment while we seem to be looking for  
15 other things.

16 When there is a suspicious order --  
17 or let's say a registrant identifies a possible  
18 suspicious order.

19 It's quite possible that, upon  
20 further investigation, the registrant could  
21 resolve the question of whether the order is  
22 suspicious and make the decision to go ahead  
23 and ship, correct?

24 MR. BENNETT: Objection. Form.

25 THE WITNESS: Correct.



CERTIFICATE OF NOTARY PUBLIC

I, Bonnie L. Russo, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in shorthand and thereafter reduced to computerized transcription under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

A handwritten signature in cursive script, reading "Bonnie L. Russo", is written over a horizontal line.

Notary Public in and for  
the District of Columbia

My Commission expires: June 30, 2020